



South Coast Air Quality Management District



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June 3, 2009

Ms. Kristin Wisdom
ConocoPhillips Company
P.O. Box 758
Wilmington, CA 90748

Subject: Transmittal of Final Title V Permit A/N 337520

Facility ID	Facility Name	Address
800363	ConocoPhillips Company Los Angeles Refinery, Wilmington	1660 W. Anaheim Street Wilmington, CA 90748

Dear Ms. Wisdom:

Enclosed is the final Title V permit, for the facility listed above, that has been issued by the South Coast Air Quality Management District (AQMD). Effective July 1, 2009, this Title V permit supersedes the current revision of the RECLAIM Facility Permit issued for your facility by the AQMD.

The draft copy of this permit was submitted to the U.S. EPA Region IX (EPA) for a 90-day review period and made available for a 60-day public comment period in July of 2008. The AQMD received comments on the draft permit from the EPA and the public during the review periods. In addition, ConocoPhillips also provided comments on the draft permit. Based on these comments, we have made the following changes to the proposed Title V permit:

List of Changes to Proposed Title V Permit - ConocoPhillips Wilmington Refinery

#	Affected Device/Cond.	Modification	Background/ reason
Based on EPA comments (EPA comment letter dated October 30, 2008)			
1	Sect. D & H Cond. F52.2	Added facility condition F52.2 (compliance with Consent Decree)	per EPA comment 3B
2	Sect. D & H Cond. F52.3	Added condition F52.3 (compliance with 40CFR60 Subpart A, 63 Subpart A and 61 Subpart A)	per EPA comment 4F
3	Sect. J, UUU#2	Updated Subpart UUU dates in Section J to 4/20/06	per EPA comment 4E
4	Sect. J, UUU#1	Updated UUU#1 (item 6) to specify that ppm values are "corrected to 3% O ₂ "	per EPA comment 4E
5	Sect. K	Updated Section K to include 40CFR63 Subpart A, 40CFR61 Subpart A, Rule 301, Rule 1402, and Rule 3006	per EPA comment 4F

#	Affected Device/Cond.	Modification	Background/ reason
6	Sect. D & H Cond. A229.1 H23.25 A26.4 D232.1 Sect. D Cond. D232.2 Sect. H. Cond. C12.3	Conditions updated to reference AMP approval or AMP application (including creation of new condition D232.2 to distinguish devices associated with different AMPs). Condition A26.4 removed and Condition D232.1/2 modified to include A26.4 information.	per EPA comment email
7	Sect. D Cond. A26.1 A26.2 Sect. D& H Cond. A26.3 D232.1	Conditions removed from D1(A26.3) and C436/C456 (A26.1 A26.2 D232.1) because AMP applications were withdrawn	per EPA comment email
8	Sect. D & H Cond. A1.1 A229.1 D82.5 H23.25	Tagged D1 (FCC) conditions with consent decree (in addition to NSPS J)	per EPA comment 3A
9	Sect. H: D1	CO, SO2, and PM limits in Emissions and Requirements column tagged with consent decree in addition to NSPS J	per EPA comment 3A
10	Sect. D: C436 C456	SO2 limits in Emissions and Requirements column tagged with consent decree in addition to NSPS J	per EPA comment 3A
11	Sect. D Cond. D82.4	Tagged C436 C456 SRU condition with consent decree (in addition to NSPS J)	per EPA comment 3A
12	Sect. D & H Cond. D232.1	Tagged heater conditions with consent decree (in addition to NSPS J) Applicable devices: D39 D41 D42 D129 D133 D135 D136 D137 D138 D139 D142 D144 D146 D148 D150 D152 D154 D155 D156 D157 D158 D161 D163 D194 D220 D259 D260 D262 D264 D684 D686 D688 (note: D329 tagged to new D232.2)	per EPA comment 3A
13	Sect. D & H Cond. B61.4 B61.10	Tagged B61.4 SRU/heater condition with consent decree (in addition to NSPS J). Created new (NSPS J only) Condition B61.10 and transferred D687 from B61.4.	per EPA comment 3A
14	Sect. D & H Cond. D82.4 D82.6	Tagged SRU condition with consent decree (in addition to NSPS J). Created new (NSPS J only) Condition D82.6 and transferred D828 D829 (Section D & H) and D1349 D1720 (Section H) from D82.4.	per EPA comment 3A
15	Sect. D & H Cond. H23.1 H23.34	Tagged SRU/heater/FCC condition with consent decree (in addition to NSPS J). Created new (NSPS J only) Condition H23.34 and transferred D687 D828 D829 (Section D) and D828 D829 D1349 D1720 (Section H) from H23.1.	per EPA comment 3A
16	Sect. D & H Cond. I1.2	Tagged condition with Rule 3004(a)(10)(C), 12-12-1997 and added: "of the conditions and compliance schedule as specified in " and "The variance (or Order for Abatement) referenced in this condition does not affect federal or citizen enforceability of the underlying SIP approved rules for which the applicant is receiving the variance (or Order for Abatement)."	per EPA comment email

#	Affected Device/Cond.	Modification	Background/ reason
Based on Facility Comments * per LARW draft Title V permit comment letter submitted 9/30/08			
17	Sect. D: D1569 D1571 D1589 D1621 Sect. H: D1589	Tagged devices with condition H23.3 (40CFR60 Subpart GGG/Rule 1173) and removed condition H23.2 (Rule 1173 only))	Updated GGG applicability per facility request
18	Sect. D: D535 D536 D543 D370 D371 D544 D545 D552 D554 D569 D579 D588 D595 D599 D600 D607 D609 D613 D614 D616 D617 D621 D623 D627 D628 D631 D632 D634 D635 D636 D637 D638 D358 D551 D557 D558 D564 D565 D593 D605 Sect. H: D1378	Tagged tanks with 40CFR63 Subpart CC Group#2	Updated CC applicability per facility request
19	Sect. D: D355 (Tk 5F-110)	Removed device from permit	per LARW comment*
20	Sect. D: D669	Removed device from permit; also removed device from Conditions B61.5 D28.11 D135.1 H23.31 and K67.15	per facility request
21	Sect. D: D1436 Sect. D Condition C1.8	Removed device and associated condition from permit	per facility request
22	Sect. D & H: D1715 D1716	Removed Condition D323.1; devices have no emission point for visible emissions	per LARW comment*
23	Sect. D: D637	Changed 'metallic shoe' to 'wiper' in equipment description	per LARW comment*
24	Sect. D: P10S1 title	Added 'claus unit' to title to read: "Sulfur Recovery Plt. No. 1, Claus Unit"	per LARW comment*
25	Sect. D: P10S2 title	Changed title from "Tail Gas Unit No. 1, Reduction Control" to "Tail Gas Treating Unit No. 1"	per LARW comment*
26	Sect. D: P10S5 title	Changed title from "Tail Gas Unit No. 2, Reduction Control" to "Tail Gas Treating Unit No. 2"	per LARW comment*
26	Sect. D: D670	Removed condition D28.11 from D670	per LARW comment*
26	Sect. D & H Cond. S18.1	Updated Condition S18.1 to include Sour Water Stripping No. 1 (P9S5) and Sour Water Stripping No. 2 (P9S6) in the listed processes that can vent to P10S1&P10S4 (consistent with Condition S15.13).	per LARW comment*
26	Sect. D Cond. E336.4	Revised Condition E336.4 to reference devices(D659 D660) that have always vented to atmosphere in an emergency	permit correction per facility request
29	Sect. D & H Cond. S15.7	Revised Condition S15.7 to include devices(D661, D662) that have always vented to atmosphere in an emergency	permit correction per facility request
30	Sect. D & H Cond. S15.2	Revised condition S15.2 to reference devices that have always vented to atmosphere in an emergency: D219 D644 D645 D646 D1367 D1370 D1673	permit correction per facility request

#	Affected Device/Cond.	Modification	Background/ reason
31	Sect. D: D1370	Modified equipment description for ammonia storage tank to reference pressure safety valves set at 285 psig	permit correction per facility request
32	Sect. H: D1705	Corrected equipment ID from D-202 to D-301	facility request
33	Sect. D: P11S1 Sect. H: P11S1	Tagged P11S1 with condition S15.2	permit correction per facility request
Other Administrative Changes: Rule Updates			
34	<i>*see below for list of devices</i>	Revised NESHAP Subpart CC citations in the Emissions and Requirements column to include date of 6/23/03	Updated rule date
	<i>*Sect. D: D64 D67 D103 D176 D177 D214 D217 D226 D242 D308 D356 D357 D358 D359 D360 D361 D362 D363 D364 D370 D371 D482 D514 D515 D516 D517 D518 D535 D536 D543 D544 D545 D546 D549 D550 D551 D552 D553 D554 D555 D556 D557 D558 D559 D560 D561 D563 D564 D565 D566 D567 D568 D569 D570 D571 D572 D573 D574 D575 D576 D577 D578 D579 D583 D584 D586 D587 D588 D589 D591 D592 D593 D594 D595 D596 D597 D598 D599 D600 D601 D602 D604 D605 D607 D609 D611 D613 D614 D615 D616 D617 D619 D621 D622 D623 D626 D627 D628 D629 D631 D632 D634 D635 D636 D637 D638 D665 D1426 D1427 D1565 D1566 D1569 D1571 D1573 D1575 D1577 D1579 D1581 D1587 D1590 D1596 D1597 D1601 D1604 D1606 D1607 D1621 D1623</i> <i>Sect. H: D308 D514 D515 D516 D517 D518 D570 D755 D842 D852 D1378 D1543 D1544 D1565 D1575 D1624 D1647</i>		
35	Sect. D & H Cond. K67.11	Updated NESHAP Subpart CC date	Updated rule date
36	Sect. D: D1 C36 C37 D165 D166 D167 D168 D169 D170 D171 D1515 D1516 D106 D107 D108 D109 D1514 D110 D111 D114 D116 D117 D118 D119 D120 D125 D126 D127 D1656 D1652 Sect. H: D1 C1742 C1743 D1373 D1374 D1375 D754	Revised NESHAP Subpart UUU citations in the Emissions & Requirements column to include date of 4/20/06	Updated rule date (see EPA comment 4E)
37	Sect. D: D39 D40 D42 D129 D133 D142 D144 D148 D150 D152 D139 D158 D161 D163 D259 D260 D262 D329 D332	Revised Rule 1146 citations in the Emissions & Requirements column to include date of 9/5/08	Updated rule date
38	Sect. D: D696 E1643 E1644 E1689 E1642	Revised Rule 1171 citations in the Emissions & Requirements column to include date of 2/1/08	Updated rule date
39	Sect. D Cond. H23.3 Sect. H Cond. H23.3 H23.22	Revised 40CFR 60 Subpart GGG citations in conditions to include date of 6/2/08	Updated rule date
40	Sect. D & H Cond. S4.2 S13.10 Sect. H Cond. H23.10	Revised 40CFR 60 Subpart QQQ citations to include date of 10/17/00	Updated rule date
41	Sect. D & H Cond. S13.2 S13.8 K67.11	Revised Rule 1149 citations to include date of 5/2/08	Updated rule date
42	Sect. D & H Cond. S13.8 S13.9 K67.11 K171.2 Sect. D Cond. B22.4	Revised Rule 1178 citations to include date of 4/7/06	Updated rule date

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43	Sect. D Cond. H23.33	Revised 40CFR 60 Subpart Ka citations to include date of 12/14/00	Updated rule date
44	Sect. D: D696	Added 12/2/05 Rule 1151 citation	Updated rule date
45	Sect. D Cond. H23.16	Revised 40CFR 60 Subpart K citations to include date of 10/17/00	Updated rule date
46	Sect. D & H Cond. F14.1	Added reference to SIP-approved version of Rule 431.2	Updated rule date
47	Sect. D & H Cond. S13.4 D330.1 J109.1 J110.1	Added reference to SIP-approved version of Rule 461	Updated rule date
48	Sect. D: F52.2 A1.1 A195.7 A195.8 A195.9 A195.10 A195.11 A195.13 A229.1 B61.4 D29.4 D82.4 D82.5 D232.1 D232.2 H23.1 H23.25 H23.27 H23.32 Sect. H: F52.2 A1.1 A195.7 A195.8 A195.9 A195.10 A195.11 A195.13 A229.1 B61.4 D29.4 D82.5 D232.1 H23.1 H23.25 H23.32	Consent Decree references in Conditions updated to date of second amendment: 8/11/08	Updated date
49	Sect. D: D1 C436 C456 Sect. H: D1	Consent Decree references in Emission Limits updated to date of second amendment: 8/11/08	Updated date
Other Administrative Changes: Title V Requirements			
50	Sect. D Cond. C6.4 C8.2 C12.1 D12.10 D12.13 D28.6 D28.11 D28.17 D29.1 D29.2 D82.2 D90.3 D322.1 D322.2 D322.3 D323.1 D323.2 D323.3 D323.4 D323.5 D323.6 D328.1 D330.1 E102.1 K67.7 K67.8 K67.9 Sect. H Cond. C8.4 D12.10 D28.17 D29.2 D90.3 D323.1 D323.2 D323.3 D323.4 D323.5 D328.1 D330.1 K67.7	Removed child condition from all conditions specifying that requirements are effective once TV is issued	per Title V permit requirements
Administrative Permit Corrections per AQMD			
51	Sect. H: D1720	Removed emissions & requirements 400 ppm CO limit and Condition H23.24 (40CFR63 Subpart DDDDD was rescinded)	permit correction
52	Sect. D: D610	Removed condition H23.15 (40CFR060 Subpart Kb). Tank is subject to Subpart Ka (H23.33).	permit correction
53	Sect. D: D549 D555 D602 D612 D630 D633 D546 D556	Typo corrected: Replaced "VOC" with "Benzene" in emissions and requirements column when tagging with Subpart FF and not specifying a ppm limit	permit correction
54	Sect. D & H Cond. S4.2 S31.1	Typo corrected: "All open-ended valves" corrected to "All open-ended lines"	permit correction
55	Sect. D Cond. F60.1	Typo corrected: from "originated from the equipment" to "from the originating equipment"	permit correction

#	Affected Device/Cond.	Modification	Background/ reason
56	Sect. D & H Cond. S18.2 S15.16 S18.8 S15.13	Removed references to P9S1 and P9S2 from conditions (P9S1&2 removed from permit)	permit correction
57	Sect. H: removed D1803	Removed D1803 from Section H; should appear only in Section D	permit correction
58	Sect. H: added D1620	Tagged D1620 with updated A/N and included in permit unit appearing in Section H	permit correction
59	Sect. H: D14	Tagged with D323.1; Condition inadvertently omitted during conversion of condition D401 to D323 series (Section D device is tagged with D323.1)	permit correction
60	Sect. D & H Cond. D381.1 D323.1 D323.2 D323.3 D323.4 D323.5 D323.6 D323.7	Replaced Condition D381.1 with improved and modified condition D323.3 (quarterly frequency) for D695, and rearranged D323.x conditions to maintain monitoring frequency order (D323.1=annual, D323.2=semiannual, D323.3=quarterly, D323.4=monthly, D323.5=biweekly, D323.6=weekly, and D323.7=daily)	permit correction
61	Sect. H: D686	Added control device C1773 (an SCR) to the "Connected To" column for this boiler.	permit correction
62	Sect. D Cond. H23.26	Modified text of condition for consistency.	permit correction
63	Sect. D Cond. H23.27	Tagged with NSPS J	permit correction
64	Sect. H: D1 C1740 C1741 C1742 C1743	Updated 'connected to' to show D1 connected to C1740 connected to C1741 connected to C1742 & C1743	permit correction
65	Sect. D: D1652 D1656	Changed rule reference from UUU#3 to UUU#4 (devices are subject to NSPS J)	permit correction
66	Sect. D: D665 Sect. H: D1378	Removed D719 (vapor recovery compressor) from 'connected to' column because Condition E336.3 requires venting to vapor recovery, and since knockout pots and flash vessels are located between D665/D1378 and D719.	permit correction
67	Sect. D & H Cond. D28.17	Removed Rule 3004(a)(4) from this BACT condition since the subject monitoring is not a TV periodic monitoring requirement.	permit correction
68	Sect. D Cond. D82.2	Removed Rule 3004(a)(4) from this condition tagged to C830 and added Rule 2011 and 2012.	permit correction
69	<p>The underlying rule(s) for TV periodic monitoring requirements were added to each of the Conditions listed below.</p> <ul style="list-style-type: none"> a - Condition C6.4 (Sec. D): Tagged Rule 401, 481, 1107 and 1171. b - Condition C8.2 (Sec. D): Tagged Rule 468 and 40CFR60 Subpart J. c - Condition C8.4 (Sec. H): Tagged Rule 407. d - Condition C12.1 (Sec. D): Tagged Rule 401, 404, 405, and 40CFR60 Subpart J. e - Condition D12.13 (Sec. D): Tagged Rule 401, 404, 405, and 1140. f - Condition D28.6 (Sec D): Tagged Rule 404, 407 and 409. 		

#	Affected Device/Cond.	Modification	Background/ reason
g	- Condition D28.11 (Sec D):	Tagged Rule 404.	
h	- Condition D29.1 (Sec. D):	Tagged Rule 404, 405, and 40CFR60 Subpart J.	
i	- Condition D29.2 (Sec. D&H):	Tagged Rule 1303(b)(2) – Offset.	
j	- Condition D90.3 (Sec. D&H):	Tagged Rule 1176 and removed this Condition from device C530 and C1343 (replaced D90.3 with new D90.13).	
k	- Condition D90.13 (Sec. D&H):	Created a duplicate Condition to D90.3. Tagged this new Condition with Rule 3004(a)(4) and 1303(a)(1) – BACT and tagged the Condition to devices C530 and C1343.	
l	- Condition D322.1 (Sec. D):	Tagged Rule 401, 404, 405 and 1140.	
m	- Condition D322.2 (Sec. D):	Tagged Rule 401, 481, 1107 and 1171.	
n	- Condition D322.3 (Sec. D):	Tagged Rule 401, 404 and 405.	
o	- Condition D328.1 (Sec. D&H):	Tagged Rule 407 and 1146. Removed this Condition from devices D41, D154, D155, D156, D157, D220, D264, D684, D686, D687, D688 and D1720 (replaced with new Condition D328.2)	
p	- Condition D328.2 (Sec. D&H):	Created a duplicate Condition to D328.1. Tagged this new Condition with Rule 3004(a)(4) and 407 and tagged the Condition to devices D41, D154, D155, D156, D157, D220, D264, D684, D686, D687, D688, and D1720.	
q	- Condition E102.1 (Sec. D):	Tagged Rule 401.	
r	- Condition K67.9 (Sec. D):	Tagged Rule 401.	
70	Rule 3004(a)(4) and/or the underlying rules for TV periodic monitoring requirements were added to the following Condition:		
a	- Condition C8.5 (Sec. H):	Tagged Rule 3004(a)(4).	
b	- Condition C8.6 (Sec. H):	Tagged Rule 3004(a)(4).	
c	- Condition C12.2 (Sec. H):	Tagged Rule 401, 404, 405, 3004(a)(4) and 40CFR60 Subpart J.	
d	- Condition C12.3 (Sec. H):	Tagged Rule 401, 404, 405, 3004(a)(4) and 40CFR60 Subpart J.	
e	- Condition D28.1 (Sec. D):	Tagged Rule 3004(a)(4) and 407.	
f	- Condition D28.2 (Sec. H):	Tagged Rule 3004(a)(4) and 407.	
g	- Condition D28.8 (Sec. D&H):	Tagged Rule 3004(a)(4) and 407.	
h	- Condition D28.16 (Sec. H):	Tagged Rule 3004(a)(4), 407 and 469.	
i	- Condition D90.5 (Sec. H):	Tagged Rule 3004(a)(4) and 407.	
j	- Condition D182.4 (Sec. D):	Tagged Rule 3004(a)(4) and Rule 401.	
k	- Condition E71.20 (Sec. H):	Tagged Rule 3004(a)(4) and 407.	

Some of the comments submitted by the facility on September 30, 2008 have been resolved, as shown in the above table. However, other comments made by the facility will be addressed at a later date through open permit applications, additional administrative applications, PC to PO conversions, etc, as indicated in AQMD's Permit Engineer's (Cynthia Carter) email to ConocoPhillips' Permitting and Compliance Coordinator (Knut Beruldsen) on May 26, 2009.

Pursuant to Administrative Change applications submitted by the facility, the following administrative changes are also incorporated into the permit:

#	A/N	Equipment	Device ID	Permit Action	Section	Revision #	Process	System
1	492159 492160 492161 493241 493252 492162 492561 494886	Tk 72 Tk 336 Tk 328 Tk 350 Tk 71 Tk 327 Tk 62 Tk 278	D600 D543 D536 D622 D599 D535 D553 D617	Added 'with a mixer' to Device Description for devices that have always had tank mixers.	D	25	13 13 13 13 13 13 13 13	2 1 1 2 2 1 3 2
2	492163	Tk 148	D568	Revised EFR Tank No. 148 (D568) equipment description to correct volume to 99,000 bbl and remove reference to mixer	D	25	13	3
3	492164	152-B-703	D40	Removed redundant condition D332.1 from heater 152-B-703 (D40) (use only existing D328.1)	D	25	1	4
4	493275 493277 493290 493295	100-H-107 100-H-2 89-B-101 59-B-201	D163 D152 D142 D129	Revised heater description to identify correct burner model PNDR-18M	D	25	3 2 2 2	5 10 8 6
5	493276 493285 493289 493300	100-H-105 100-H-105 90-B-203 79-B-201	D161 D150 D148 D133	Revised heater description to identify correct burner model PNDR-20M	D	25	3 2 2 2	5 10 9 7
6	493302	59-B-101	D194	Revised equipment description for heater 59-B-101 to list 8 burners	D	25	2	6
7	495092	(pump)	D1587	Removed condition II.1 referencing Variance 4900-57, pump has been replaced	D	25	5	1
8	326143	F-205-38 F-209-19	D1809 D1447	Created new device D1809 and modified device D1447	D	25	9	9
9	487260	V2714 V2413 V2713	D1449 D1450 D1451	Cancelled PC associated with A/N 487260 (removed from Section H; Removed devices D1449-D1451)	H	41	9	9

The permit also includes administrative changes to convert five Permits to Construct (PC) to Permits to Operate (PO). These changes were made in Revision #24 of Section D, issued as a local permit. A list of these applications is provided below:

#	A/N	Equipment	Device ID	Permit Action	Section	Revision #	Process	System
1	378404	Tk-300	D644	Converted PC to PO	D	24	13	6
2	378405	Tk-301	D645	Converted PC to PO	D	24	13	6
3	378406	Tk-302	D646	Converted PC to PO	D	24	13	6

#	A/N	Equipment	Device ID	Permit Action	Section	Revision #	Process	System
4	378414	Tk-442	D661	Converted PC to PO	D	24	13	7
5	378419	Tk-443	D662	Converted PC to PO	D	24	13	7

Local Permits Issued Pursuant to Rule 3002(a):

In addition, please note that local permits in the table below were issued to ConocoPhillips pursuant to Rule 3002(a) as part of this Title V permit. This rule allows the District to issue a non-Title V permit to existing Phase One or Phase Two facilities that apply for a non-Title V permit prior to the issuance of their initial Title V permit. **In accordance with device condition I30.1, ConocoPhillips is required to file an application for a Title V permit revision for this equipment within 90 days of the issuance of the facility's initial Title V permit.**

#	A/N	Equipment	Device ID	Permit Action	Section	Revision #	Process	System
1	493550	Fuel Dispensing Station	D697 D698 D700	Installation of Fuel Storage & Dispensing, Healy Phase II Enhanced Vapor Recovery (EVR) System without ISD upgrade	H	40	16	5
2	495174	Internal Combustion Engine	D732	Installation of Air-to-Fuel Ratio Controller on IC Engine for Rule 1110.2 Compliance	H	39	14	2
3	480888	SCR	C830	Replacement of SCR catalyst	H	38	14	4
4	484546	Turbine & others	D828 & Various	Basic equipment review to ensure compliance with new SCR catalyst	H	38	14	3

Any questions on the permit should be directed to Ms. Cynthia Carter at (909) 396-2431 or ccarter@aqmd.gov.

Sincerely,



Mohsen Nazemi, P.E.
Deputy Executive Officer
Engineering and Compliance

MN:JC:BC:CC
Attachment

cc: With Attachment

Compliance
Title V A/N 337520 File
Central Permit File

Without Attachment

Gerardo C. Rios, U.S. EPA
Barry R. Wallerstein
Jay Chen
William Thompson